

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR, ET AL.
Plaintiffs

VS.

C.A. NO. 04-312/L

JEFFREY DERDERIAN, ET AL.
Defendants

**NOTICE OF MOTION AND MOTION FOR
ADMISSION *PRO HAC VICE* OF GEORGE E. WOLF**

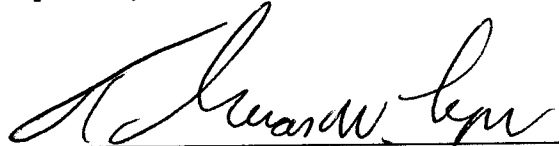
PLEASE TAKE NOTICE that Leggett & Platt Incorporated and L&P Financial Services Co. hereby move before the Hon. Ronald R. Lagueux, U.S.D.J., at the United States District Court for the District of Rhode Island, Providence, Rhode Island, for an Order to have George E. Wolf, Esq. admitted to this Court to appear *Pro Hac Vice* on behalf of defendants, Leggett & Platt Incorporated and L&P Financial Services Co., in the above action; and

Defendants, Leggett & Platt Incorporated and L&P Financial Services Co. shall rely upon the Affidavits of Thomas Lyons, Esq. and George E. Wolf submitted herewith; and

A proposed form of Order is also submitted herewith; and

Defendants, Leggett & Platt Incorporated and L&P Financial Services Co. waive oral argument on the return date of this motion and submits same for a ruling on the papers.

Respectfully submitted,



Thomas W. Lyons, Esquire
STRAUSS, FACTOR, LAING & LYONS
Attorney for Leggett & Platt Incorporated
and L&P Financial Services Co.
222 Richmond Street, Suite 208
Providence, RI 02903-2914
401-456-0700
tlyons@straussfactor.com

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CERTIFICATION

I hereby certify that on this 20th day of September, 2004, a copy of the within was mailed to counsel of record as set forth on the attached certificate of service by regular mail, postage prepaid.

Christine Abkames

UNITED STATES DISTRICT COURT
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Defendants

**AFFIDAVIT IN SUPPORT OF MOTION
FOR LEAVE TO APPEAR *PRO HAC VICE***

George E. Wolf, being duly sworn deposes and says:

1. I am a partner in the law firm of Shook, Hardy & Bacon, Kansas City, Missouri and make this Affidavit in support of my Motion for Admission Pro Hac Vice to appear for defendants, Leggett & Platt Incorporated and L&P Financial Services Co. in the above matter.

2. I am a member of the State bar of Missouri (1986).

3. I am admitted to the following United States District Courts: Western District of Missouri (1986) and Western District of Oklahoma (1998).

4. I am also admitted to the Eighth Circuit Court of Appeals (1988).

5. I am a member of the bar in good standing of all the aforementioned courts.

6. There are no disciplinary proceedings pending against me as a member of the bar of any jurisdiction.

7. I have not been admitted pro hac vice in any other matter pending in this court in the preceding 24 months.

8. Shook, Hardy & Bacon, LLP has represented Leggett & Platt Incorporated and L&P Financial Services Co. for more than 10 years and has appeared on its behalf in litigation throughout the United States before United States District and state courts.

9. In addition to my familiarity with the law in this area, I am aware of the industry practices and the business methods of Leggett & Platt Incorporated and L&P Financial Services Co. I am also aware of the previous business relationship of Leggett & Platt Incorporated and L&P Financial Services Co. and its customers.

10. In view of the foregoing, Leggett & Platt Incorporated and L&P Financial Services Co. have requested that I represent them in this action now pending in the United States District Court for the District of Rhode Island.

11. My co-counsel for this action is Thomas Lyons of the law firm of Strauss, Factor, Laing & Lyons, and he is qualified to practice before the United States District Court for the District of Rhode Island.

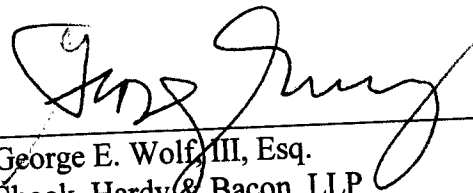
12. I have reviewed and shall comply with the Local Rules of the District of Rhode Island including, without limitation, all applicable disciplinary rules, and, specifically Rule 5(c) of the Local Rules.

13. Based on the foregoing, I request that I be specially admitted to the bar of the United States District Court for the District of Rhode Island for the purpose of representing Leggett & Platt Incorporated and L&P Financial Services Co. in the instant litigation.

14. I declare under penalty of perjury that the foregoing is true and accurate.

DATED:

Kansas City, Missouri



George E. Wolf, III, Esq.
Shook, Hardy & Bacon, LLP
One Kansas City Place
1200 Main Street
Kansas City, MO 64105-2118
Tel.: 816-474-6550
Fax: 816-421-5774

Sworn to before me this
15th day of September, 2004.


Notary Public

LUCIA FATINO ROONEY
Notary Public - State of Missouri
JACKSON COUNTY
My Comm. Exp. July 7, 2006

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

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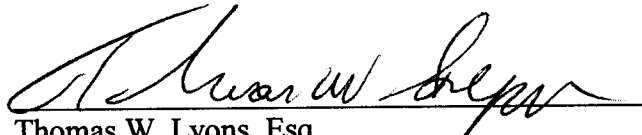
**AFFIDAVIT OF THOMAS LYONS, ESQ. IN
SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE OF GEORGE E. WOLF, ESQ.**

Thomas Lyons, Esq., being duly sworn deposes and says:

1. I am an attorney at law and partner with the law firm of Strauss, Factor, Laing & Lyons, with offices at 222 Richmond Street, Suite 208, Providence, Rhode Island.
2. Pursuant to Local Rule 5 of the Rules of the United States District Court for the District of Rhode Island, I submit this affidavit in support of the request of the defendants, Leggett & Platt Incorporated and L&P Financial Services Co. , for an Order permitting George E. Wolf, Esq. of the law firm of Shook, Hardy & Bacon, LLP to appear *pro hac vice* on behalf of Leggett & Platt Incorporated and L&P Financial Services Co. in the above-captioned matter.
3. I am the attorney at Strauss, Factor, Laing & Lyons who is responsible for the handling of this matter on behalf of Leggett & Platt Incorporated and L&P Financial Services Co. I hereby agree to supervise the conduct of Mr. Wolf as required under the Rules of the Court and any additional requirements which may be imposed by the Judge, to which this action is assigned.
4. Wherefore, Leggett & Platt Incorporated and L&P Financial Services Co. respectfully requests that this Honorable Court enter an Order permitting George E. Wolf of the law firm of Shook, Hardy & Bacon, LLP, to appear *pro hac vice* on its behalf in connection with the above-captioned matter.

DATED:

Providence, Rhode Island



Thomas W. Lyons, Esq.

Strauss, Factor, Laing & Lyons

222 Richmond Street, Suite 208

Providence, RI 02903

Tel.: 401-456-0704

Fax: 401-421-4730

Sworn to before me this

17th day of September, 2004.



Notary Public